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Attorneys for Sonos, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA,
SAN FRANCISCO DIVISION

18 SONOS, INC.,
19 Plaintiff and Counter-defendant,
20 v.
21 GOOGLE LLC,
22 Defendant and Counter-claimant.

Case No. 3:20-cv-06754-WHA
Consolidated with Case No. 3:21-cv-07559-WHA

**DECLARATION OF CLEMENT
ROBERTS IN SUPPORT OF SONOS,
INC.'S ADMINISTRATIVE MOTION
TO FILE UNDER SEAL RE SONOS,
INC.'S SUPPLEMENTAL BRIEF
REGARDING '885 AND '966 PATENTS**

1 I, Clement Roberts, declare as follows and would so testify under oath if called upon to do
 2 so:

3 1. I am an attorney with the law firm of Orrick, Herrington & Sutcliffe LLP, counsel
 4 of record to Sonos, Inc. ("Sonos") in the above-captioned matter. I am a member in good
 5 standing of the Bar of the State of California. I make this declaration based on my personal
 6 knowledge, unless otherwise noted. If called, I can and will testify competently to the matters set
 7 forth herein.

8 2. I make this declaration in support of Sonos's Administrative Motion to File Under
 9 Seal in connection with Sonos's Supplemental Brief Regarding '885 and '966 Patents.

10 3. Sonos seeks an order sealing the materials as listed below:

11 DOCUMENT	12 PORTIONS TO BE SEALED	13 DESIGNATING PARTY
14 Exhibit 5 to Kolker Declaration	15 Portions identified with blue highlighting	16 Sonos

17 4. The portions of Exhibit 5 to the Kolker Declaration identified with blue
 18 highlighting contain references to Sonos's confidential business information and trade secrets,
 19 including source code. This source code is confidential information that Sonos does not share
 20 publicly, which reveals technical details of the operation of Sonos's technology. Thus, public
 21 disclosure of such information may lead to competitive harm as Sonos's competitors could use
 22 these details to gain a competitive advantage in the marketplace with respect to their competing
 23 products. A less restrictive alternative than sealing the portions of Exhibit 5 to the Kolker
 24 Declaration would not be sufficient because the information sought to be sealed is Sonos's
 25 confidential business information and trade secrets and is integral to Sonos's legal arguments.

26 I declare under penalty of perjury that the foregoing is true and correct to the best of my
 27 knowledge. Executed this 1st day of May, 2023 in Belvedere, California.

28
 29 /s/ Clement S. Roberts
 30 Clement Seth Roberts